# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

ABRAHAM PHILIP, MD, Plaintiff,	) ) ) CIVIL ACTION: 04-CV-11069-JLT
vs.	)
<b>v</b> 3.	)
JOHN CRONIN, in his personal capacity,	) )
Defendant.	)

#### ASSENTED TO MOTION TO REMOVE ENTRY OF DEFAULT

In accordance with F.R. C.iv. P. 55(c), the defendant John Cronin requests that the default entered against him be set aside. He states that good cause exists for the removal of the entry of default here: on the very day of the entry he filed an answer to the complaint in this action.

Further, the defendant states that he has a good defense to this complaint, and requests the opportunity to assert it.

Respectfully Submitted,

THOMAS F. REILLY ATTORNEY GENERAL

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	)	
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Plaintiff,	)	
,	)	CIVIL ACTION: 04-CV-11069-JLT
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	)	
JOHN CRONIN, in his personal	)	
capacity,	)	
Defendant.	)	
	)	

#### **LOCAL RULE 7.1 CERTIFICATE**

I, Mary O'Neil, counsel for the defendant John Cronin, state that on Thursday, August 19<sup>th</sup>, 2004 I conferred with plaintiff's counsel, Daniel Sharp, regarding assenting to a motion to remove the default entry. He kindly agreed to assent.

Respectfully submitted,

THOMAS F. REILLY ATTORNEY GENERAL

### **CERTIFICATE OF SERVICE**

I, Mary O'Neil, certify that a true copy of the documents above were served upon plaintiff's counsel by electronic filing and first class mail, pre-paid on August 24, 2004.

<u>/s/</u> Mary O'Neil	
Mary O'Neil	